

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

CA #: 04CV12058WGY

BETTE J. RIVARD, as Administratrix of )  
the Estate of John A Horton, )  
Plaintiff )  
v. )  
DARTMOUTH HOUSE OF CORRECTION, )  
BRISTOL COUNTY, JOHN DOE, )  
RICHARD ROE, Bristol County Corrections )  
employees the identity and number of whom is )  
presently unknown to the Plaintiff, )  
Defendants/ )  
Third Party Plaintiffs )  
v. )  
PRISON HEALTH SERVICES, INC. and )  
CORRECTIONAL HEALTH CARE )  
SOLUTIONS, INC. )  
Third Party Defendants )  
)

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**CERTIFICATE PURSUANT TO L.R. 7.1 FOR PRISON HEALTH  
SERVICES, INC'S MOTION TO TAKE THE DEPOSITION OF MARK HIGGINS A  
PERSON CONFINED IN A COUNTY CORRECTIONAL FACILITY**

I, Victor J. Koufman, counsel for Prison Health Services, Inc., hereby certify that we have conferred with Plaintiff's counsel and co-defense counsel in the above captioned matter and attempted in good faith to resolve or narrow the issues contained within this motion. I also certify that neither party has any objection to this motion to depose Mark Higgins.

Respectfully submitted,  
Prison Health Services, Inc.  
By its attorneys,

DATED:8/24/05

/s/ Victor J. Koufman

Victor J. Koufman, Esq., BBO # 545296  
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**CERTIFICATE OF SERVICE**

I, Victor J. Koufman, attorney for Prison Health Services, Inc., hereby certify that I have this 24<sup>th</sup> day of August, 2005 forwarded a copy of the foregoing document, by first-class mail, postage pre-paid, upon counsel of record named below:

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*/s/ Victor J. Koufman*

Victor J. Koufman